

REPLY TO OFFICE ACTION DATED OCTOBER 5, 2004

SERIAL NO: 09/834,325
DOCKET NO: 199-0044US**REMARKS**

Claims 1-15, and 24-33 are pending.

Claims 26 and 28 have been amended.

Claims 16-23 have been canceled.

Claim Objection

Applicant respectfully contends that the Examiner's objection requiring that Applicant change "a docking station" to "the docking station" is not well-founded as this element is not yet positively recited in the claims prior to this point and thus has no proper antecedent basis. See MPEP § 2175.05(e).

Rejections under 35 U.S.C. § 103**Claims 1-3, 5-11, 15, 24-25 and 30-31**

The Examiner rejected claims 1-3, 5-11, 15, 24-25, and 30-31 under § 103(a) as obvious over U.S. Patent 5,617,539 to Ludwig ("Ludwig"), U.S. Patent 5,768,163 to Smith II ("Smith") and U.S. Patent 5,844,599 to Hildin ("Hildin"). Claims 1 and 24 are independent claims; all of the remaining claims depend, either directly or indirectly, from one of these claims. Because independent claims 1 and 24 are allowable over the cited art, it is not necessary to address the rejections of the dependent claims. Therefore, the following remarks focus on independent claims 1 and 24.

It is the Examiner's burden to establish a *prima facie* case of obviousness. MPEP § 2142. One criteria necessary to the establishment of a *prima facie* case of obviousness is that the proposed combination of prior art references must teach or suggest all the claim limitations. *Id.* Applicant respectfully submits that the combination of Ludwig, Smith and Hildin proposed by the Examiner fails to teach or suggest each limitation of claims 1 and 24. Thus, Examiner has failed to establish a *prima facie* case of obviousness. Withdrawal of the rejection and allowance of the claims is therefore requested.

Claim 1 is directed to a video conferencing system that includes, among other things, a

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“docking station adapter configured to removably couple to a docking station that connects the main unit in a communicating relationship with a video conferencing network.” Claim 24 includes a substantially identical limitation. In contrast, Ludwig is drawn to a typical prior art computer-based videoconferencing network based on a desktop or other workstation environment. Ludwig lacks any teaching or suggestion of the required docking station adapter configured to removably couple to a docking station or that connects a videoconferencing unit to a docking station.

Examiner contends that Multimedia Local Area Network (“MLAN”) 10 in Fig. 1 of Ludwig is the required docking station. MLAN 10 in Fig. 1 *is not* a docking station, and the description of MLAN 10 in Ludwig reveals as much. *See* Ludwig, col. 7, lines 1–4 (“MLAN 10 typically extends over a distance from a few hundred feet to a few miles, and is usually located within a building or a group of proximate buildings.”). Even if the elements were similar, which Applicants do not concede, there is no suggestion of a removable coupling between MLAN 10 and the remainder of the video conferencing system as Examiner’s argument implies.

Neither Hildin nor Smith supplies the missing docking station limitation. Hildin contains no teaching or suggestion of a modular video conferencing system that includes the required docking station adapter. Smith is directed to the non-analogous field of attaching handheld devices to personal computers. Because Examiner has failed to establish a *prima facie* case of obviousness, rejection of claims 1 and 24 under § 103(a) is improper. Allowance of these claims and all the claims depending therefrom is requested.

Claims 4 and 12–14

The Examiner rejected claims 4 and 12–14 under § 103(a) as obvious over Ludwig, Smith and Hildin and further in view of U.S. Patent 5,745,733 to Robinson (“Robinson”). However, as these claims each depend from claim 1, they are patentable for at least the same reasons as independent claim 1. Reconsideration and withdrawal of this rejection is therefore requested.

Claims 26 and 33

The Examiner also rejected claims 26 and 33 under §103(a) as obvious over Ludwig. Applicant has amended independent claim 26 to recite the additional limitation of “a camera unit

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comprising a camera; and an adapter that is removably electrically and mechanically attachable to the main unit." Neither Ludwig nor any of the cited references teach each limitation of claim 26 as amended. For example, Ludwig, as set forth in the argument above, lacks any teaching or suggestion of the required docking station adapter configured to removably couple to a docking station. Because neither Ludwig nor any of the cited references teach or suggest each element of claim 26, Examiner has failed to establish a *prima facie* case of obviousness. Rejection of claim 26 under § 103(a) is therefore improper. Allowance of claim 26 as amended and all the claims depending therefrom, i.e., claims 27-33, is therefore requested.

Claim 27

The Examiner rejected claim 27 under § 103(a) as obvious over Ludwig in view of U.S. Patent 5,675,524 to Bernard ("Bernard"). However, as this claim depends from claim 26, it is patentable for at least the same reasons as independent claim 26. Reconsideration and withdrawal of this rejection is therefore requested.

Claims 28-30

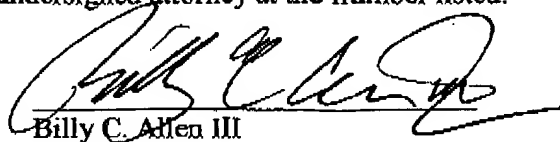
Finally, the Examiner rejected claims 28-30 under § 103(a) as obvious over Ludwig and Smith. However, as this claim depends from claim 26, it is patentable for at least the same reasons as independent claim 26. Reconsideration and withdrawal of this rejection is therefore requested.

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Reconsideration of the pending claims in light of the above remarks and allowance of all pending claims are respectfully requested. If, after considering this reply, the Examiner believes that a telephone conference would be beneficial towards advancing this case to allowance, the Examiner is invited to contact the undersigned attorney at the number listed.

Date

11/23/04

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